

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JACKSON NATIONAL LIFE INSURANCE)
COMPANY, a Michigan corporation,)
)
Plaintiff,)
)
v.)
)
CROSLAND, LLC, a North Carolina)
limited liability company,)
)
)
Defendant.)
_____)

No. 11-cv-01639
Judge Chang

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT BY CONSENT

Plaintiff Jackson National Life Insurance Company ("Plaintiff"), by and through its attorneys, Drinker Biddle & Reath LLP, moves for entry of judgment by consent, and states as follows:

- (1) The parties have executed a Judgment by Consent that attaches an agreed Final Judgment;
- (2) Plaintiff moves for entry of the Final Judgment Order.

Respectfully Submitted,

Dated: September 12, 2011

Jackson National Life Insurance Company
By its attorneys,

/s/ Daniel J. Delaney
Daniel J. Delaney (IL Bar No. 6201067)
Aruna B. Subramanian (IL Bar No. 6300978)
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CERTIFICATE OF SERVICE

I, Daniel J. Delaney, an attorney hereby certify that on September 12, 2011 the foregoing Plaintiff's Motion for Entry of Judgment by Consent, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Daniel J. Delaney